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8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 BANK OF AMERICA, N.A.,

11 Plaintiff,

12 vs.

13 NORTH AMERICAN TITLE INSURANCE
14 COMPANY,

15 Defendants.

Case No.: 2:21-cv-00584-KJD-NJK

**STIPULATION AND ORDER TO
EXTEND DEADLINES TO RESPOND
TO NATIC'S PENDING MOTIONS**

(First Request)

16 Plaintiff, Bank of America, N.A. ("BANA") and Defendant, North American Title
17 Insurance Company ("NATIC"), by and through their undersigned counsel, stipulate and agree
18 as follows:

- 19 1. On September 29, 2023, NATIC filed a Motion for Summary Judgment [ECF No. 36], as
20 well as a Motion to Seal and Redact an exhibit to the Motion [ECF No. 38].
- 21 2. BANA's response to the Motion to Seal is currently due October 13, 2023, while NATIC's
22 response to the Motion for Summary Judgment is due October 20, 2023.
- 23 3. On October 12, 2023, the Nevada Supreme Court issued its opinion in *Deutsche Bank*
24 *National Trust Company v. Fidelity National Title Insurance Company*, Case No. 84161,
25 139 Nev. Ad. Op. 45 (Oct. 12, 2023) ("*Deutsche Bank Opinion*"). The *Deutsche Bank*
26 *Opinion* addresses the arguments in this matter; however, the Parties need additional time
27 to analyze the *Deutsche Bank Opinion* and determine next steps.
28

4. BANA therefore requests an additional thirty-one (31) days to file its response to the pending Motion for Summary Judgment, and an additional thirty-eight (38) days to respond to the pending Motion to Seal, such that both deadlines fall on the same day: November 20, 2023.

5. Counsel for NATIC does not oppose the requested extension.

6. This is the first request for an extension which is made in good faith and not for purposes of delay.

IT IS SO STIPULATED.

DATED this 13th day of October, 2023.

DATED this 13th day of October, 2023.

WRIGHT, FINLAY & ZAK, LLP

SINCLAIR BRAUN KARGHER LLP

/s/ Lindsay D. Dragon, Esq.

/s/ Kevin S. Sinclair, Esq.

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Title Insurance Company*

IT IS SO ORDERED.

Dated this 13th day of October, 2023.


UNITED STATES DISTRICT COURT JUDGE